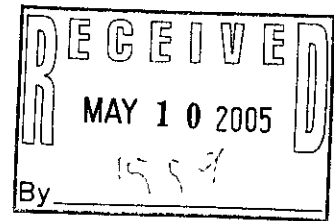




Community Bankers Association of Ohio

Increasing the Value of Independent Financial Institutions Since 1974



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1060 Kingsmill Parkway • Columbus, Ohio 43229 • (614) 846-8124 • Ohio Toll Free 800-The-CBAO

May 02, 2005

Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N.W.  
Washington, D.C. 29429

RIN number 3064-AC89

Dear Robert E. Feldman,

The Community Bankers Association of Ohio (CBAO) is Ohio's oldest statewide financial trade association representing Independent Community Bank and Thrift Institutions. CBAO exclusively represents Community Banks and Thrifts in Ohio who serve their communities through 1500 locations, with more than \$75 Billion in assets, \$56 Billion in insured deposits and over \$55 Billion in net loans.

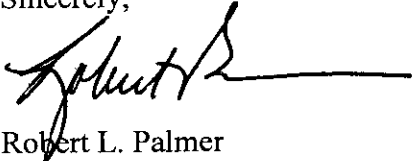
We appreciate a new proposal being issued to solicit additional comments on the impact of changing the definition of a small bank for purposes of CRA to include those with total assets of up to \$1 billion, regardless of holding company affiliation.

The CBAO strongly supports your proposal to increase the size limit for community financial institutions eligible for the small bank streamlined Community Reinvestment Act Examination from \$250 million to \$1 billion. We also support establishing a community development test which would permit our financial institutions to be evaluated based upon their community development lending, qualified investments and community development services, as well as the lending test. This proposal would also help our community focused financial institutions to better compete with multibillion-dollar financial institutions for qualified investments.

This proposal would mirror the recently finalized OTS rule, which raises the limit to \$1 billion, effective October 01, 2004.

The proposed changes will not undermine the intended purpose of CRA and would ease the paperwork and examination burden on the community financial institutions in the state of Ohio.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Palmer", followed by a long horizontal line extending to the right.

Robert L. Palmer  
President and Chief Executive Officer